

**BEFORE THE
FEDERAL MARITIME COMMISSION**

DOCKET NO. 14 -10

ECONOCARIBE CONSOLIDATORS, INC.

COMPLAINANT

V.

AMOY INTERNATIONAL, LLC.

RESPONDENT

**RESPONDENT'S OBJECTIONS TO COMPLAINANT'S REPLY
EXHIBITS NOS. 2, 3, AND 6.**

Respondent Amoy International LLC objects to the admissibility of
Complainant's Reply Exhibits 2, 3 & 6 based upon a lack of
foundation/authentication F.R.E. Rule 901, hearsay F.R.E. Rules 801, 802; no
Request for Judicial Notice was made.

Complainant argues that Reply Exhibit 2 "is admissible evidence because it is party-opponent statement and not hearsay under F.R.E. Rule 801." Amoy disagrees. Unlike a website that is hosted by or belonging to Amoy, Reply Exhibit 2 is a website of TradeKey.com. Exhibit 2 contains references to multiple entities other than Amoy. For example, page two of Exhibit 2 includes companies like Hawaii Gas and ABASCO LLC of Humble TX., which have no relevance to Amoy, suggesting that Exhibit 2 was created by TradeKey.com. "... any evidence procured off the Internet is adequate for almost nothing even under the most liberal interpretation of the hearsay exception rules found in FED.R.CIV.P. 807." St. Clair v. Johnny's Oyster & Shrimp, Inc., 76 F. Supp 2d 773,775 (S.D. Tex, 1999).

Respectfully submitted,

Dated: February 6, 2015

RUSSELL, MIRKOVICH & MORROW

By:



Joseph N. Mirkovich, Esq.
RUSSELL MIRKOVICH & MORROW
One World Trade Center, Suite 1660
Long Beach, California, 90831-1660
Telephone: (562) 436-9911
Fax: (562) 436-1897
Email: jmirkovich@rumlaw.com
Attorneys for Respondent
AMOY INTERNATIONAL LLC.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing **RESPONDENT'S**
OBJECTIONS TO COMPLAINANT'S REPLY EXHIBITS NOS. 2, 3, AND

6, was sent to the below-mentioned counsel via email on February 6, 2015.

Neil B. Mooney, Esq.
THE MOONEY LAW FIRM, LLC
1911 Capital Circle, N.E.
Tallahassee, FL 32308
Telephone: (850) 893-0670
Fax: (850) 391-4228
Email: nmooney@customscourt.com

Attorneys for Complainant
ECONOCARIBE
CONSOLIDATORS, INC.



Joseph N. Mirkovich